



Reference : WC Docket No. 05-196
Compliance Letter

November 23, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch:

Please accept this letter as confirmation of the actions Vantage Communications ("Vantage") has undertaken to comply with the FCC's June 3, 2005 order establishing enhanced 911 requirements for interconnected voice over Internet Protocol (VoIP) service providers.

Requirement: Interconnected VoIP service providers must, as a condition of providing service to a consumer, provide that consumer with E911 service as described in this section.

Vantage Response: Vantage currently provides E911 service as a standard component of its hosted IP Telephony service offering.

Requirement : Interconnected VoIP service providers must transmit all 911 calls, as well as ANI and the caller's Registered Location for each call, to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's Registered Location and that has been designated for telecommunications carriers pursuant to section 64.3001 of this chapter, provided that "all 911 calls" is defined as "any voice communication initiated by an interconnected VoIP user dialing 911"

Vantage Response: The Vantage VoIP service platform currently transmits 911 calls, along with the caller's ANI and Registered Location, to the appropriate emergency operator answering point as a standard component of its hosted IP Telephony service offering.

Requirement : All 911 calls must be routed through the use of ANI and, if necessary, pseudo-ANI, via the dedicated Wireline E911 Network.

Vantage Response: The Vantage VoIP service platform currently routes all 911 calls through the use of ANI via services provided by its LEC and/or CLEC carrier partners.

Requirement : The Registered Location must be available to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information (ALI) database.

Vantage Response: The Vantage VoIP service platform currently routes all 911 calls through the use of ANI via services provided by its LEC and/or CLEC carrier partners. As such, the Registered Location of the caller is made available to the appropriate emergency operator answering point through the appropriate ALI database.

Requirement : Registered Location Requirement. As of [120 days after the effective date of the Order – November 28, 2005], interconnected VoIP service providers must:

(1) Obtain from each customer, prior to the initiation of service, the physical location at which the service will first be utilized.

Vantage Response: Vantage obtains the physical location at which the services will first be utilized by two means; 1) executed Master Service Order Agreement signed by an authorized representative of the Vantage Customer, and 2) completion, by an authorized representative of the Customer, of an Emergency Services Address (“Initial Registered Location”) Verification Form (copy attached). Both documents must be signed by the Customer prior to the initiation of service.

(2) Provide their end users one or more methods of updating their Registered Location, including at least one option that requires use only of the CPE necessary to access the interconnected VoIP service. Any method utilized must allow an end user to update the Registered Location at will and in a timely manner.

Vantage Response: Vantage currently enables end users to update their Registered Location information by contacting our 24 x 7 customer support line, where they can speak directly to a Vantage support representative who will issue the service address change order internally (which triggers a process to issue a corresponding order to the appropriate LEC/CLEC partner). Said contact can be accomplished via use of the CPE (IP stations or PC with softphone) necessary to access the Vantage VoIP service platform. End users may also e-mail us directly with the request to change their service address. In addition, in Q1 2006, Vantage will implement a web-based ticketing platform accessible by its customers for initiating work orders requesting, among other tasks, a service address change.

Requirement : Customer Notification. Each interconnected VoIP service provider shall:

(1) Specifically advise every subscriber, both new and existing, prominently and in plain language, of the circumstances under which E911 service may not be available through the interconnected VoIP service or may be in some way limited by comparison to traditional E911 service. Such circumstances include, but are not limited to, relocation of the end user’s IP-compatible CPE, use by the end user of a non-native telephone number, broadband connection failure, loss of electrical power, and delays that may occur in making a Registered Location available in or through the ALI database.

Vantage Response: Vantage informs an authorized representative of each Customer of such limitations, which are clearly listed on the Emergency Services Address (“Initial Registered Location”) Verification Form (copy attached) that is executed prior to initiation of service. A formal announcement is included in all structured end user training sessions conducted by Vantage customer support personnel. In addition, as of 11/21/05, all end user station User

Guides will include a statement regarding the limitations of E911 delivery in the event the phone is relocated from the Registered Location (service address).

(2) Obtain and keep a record of affirmative acknowledgement by every subscriber, both new and existing, of having received and understood the advisory described in subparagraph (1).

Vantage Response: Vantage currently maintains an executed original document of the Emergency Services Address ("Initial Registered Location") Verification Form that has been signed by an authorized representative of each Customer.

(3) Distribute to its existing subscribers warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructing the subscriber to place them on or near the equipment used in conjunction with the interconnected VoIP service. Each interconnected VoIP provider shall distribute such warning stickers or other appropriate labels to each new subscriber prior to the initiation of that subscriber's service.

Vantage Response: Vantage is currently preparing such warning stickers and/or placards for distribution to all end users. The target date for completion of this project is 1/31/06.

(f) Compliance Letter. All interconnected VoIP providers must submit a letter to the Commission detailing their compliance with this section no later than [120 days after the effective date of this Order – November 28, 2005].

Vantage Response: Vantage has prepared and submitted this Compliance Letter prior to the November 28, 2005 due date.

If you have questions, please contact me at 267 756-1011, or dfagan@vantage.com.

Thank you,

Douglas A. Fagan
Vice President, Operations & Customer Support
Vantage Communications

cc: Robert Patrylak – General Counsel, Vantage Communications (USA) L.L.C.